

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MARCY BROWN,	:	Civil Action No. 23-240E
	:	
Plaintiff,	:	Magistrate Judge Maureen P. Kelly
	:	
vs	:	
	:	
	:	
FRANKLIN AREA SCHOOL DISTRICT;	:	Electronically Filed
EUGENE THOMAS <i>Superintendent of</i>	:	
<i>Franklin Area School District;</i>	:	
THOMAS HOLOMAN <i>Co-Principal of</i>	:	
<i>Franklin Jr. Sr. High School</i>	:	
KRIS MILLER <i>Co-Principal of</i>	:	
<i>Franklin Jr. St. High School</i>	:	
	:	
Defendant(s).	:	

**PLAINTIFF'S CONSENTED TO MOTION FOR ENLARGEMENT OF TIME TO
COMPLETE FACT DISCOVERY**

1. The Parties by Counsel have successfully completed Initial Disclosures including the exchange of documents.
2. Fact Discovery is scheduled to be completed by April 30, 2024.
3. Additional time is needed to complete Fact Discovery.
4. Plaintiff's Counsel, Neal Sanders, has three Trials. Trial I is March 18, 2024 thru March 20, 2024. Trial II is April 8, 2024 thru April 10, 2024. Trial III is May 6, 2024 thru May 8, 2024.
5. Defendant Counsel has other case obligations.
6. Written Discovery has begun.
7. Defendant's Written Discovery Answers and Documents was just received on March 1, 2024.
8. Plaintiff's Counsel has objections to those Answers and Responses and has notified

possible.

9. Plaintiff's Written Discovery Answers and Responses are in part based upon the alleged Incomplete answers and alleged incomplete document responses by Defendant.
10. Counsel Sanders and Counsel Zaruta have agreed to make significant effort to resolve the forthcoming objections from Plaintiff's Counsel and to date Counsel Sanders and Counsel Zaruta have been cooperating and the tone has been very uplifting given the seriousness arising from the Facts of this Case.
11. Once the objections are resolved in the near future Plaintiff will answer and respond to Defendants First Set of Discovery Directed to Plaintiff.
12. Virtual Depositions of Plaintiff and Virtual Depositions Noticed by Plaintiff will be Scheduled, taken and completed within the proposed extended Fact Discovery Period.
13. Defendant's Counsel has reviewed this Motion and Proposed Order and is in Agreement.
14. The Parties by Counsel respectfully request that this Motion be granted.
15. A Proposed Order is attached.

Respectfully submitted,

LAW OFFICES OF NEAL A. SANDERS,

Dated: March 25, 2024

By: /s/ Neal A. Sanders

Neal A. Sanders, Esquire

Pa Id No. 54618

Law Offices of Neal A. Sanders

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Counsel for Plaintiff

Marcy Brown